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Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

GE ZHANG,

Plaintiff,

v.

KRISTI NOEM,¹ in her official capacity as
 Secretary of the United States Department of
 Homeland Security, *et al.*,

Defendants

Case No. 3:24-cv-08428 RFL

**STIPULATION TO EXTEND TIME FOR
 DEFENDANTS' RESPONSE TO PLAINTIFF'S
 COMPLAINT; AND [PROPOSED] ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time for Defendants' response to Plaintiff's complaint. Defendants will file their response on or before February 21, 2025. The parties make this request because Defendants need a brief period of additional time to prepare their response.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 6. Currently, Defendants must file a motion for summary judgment by 120 days after the complaint was served, or April 8, 2025. In view of the agreed-upon extension for Defendants' response to the complaint, the

¹ Kristi Noem is automatically substituted as the defendant in this matter in accordance with Federal Rule of Civil Procedure 25(d).

1 parties request that Defendants must file their motion for summary judgment by April 22, 2025.

2 Dated: February 7, 2025

Respectfully submitted,²

3 ISMAIL J. RAMSEY
4 United States Attorney

5 /s/ Elizabeth D. Kurlan
6 ELIZABETH D. KURLAN
7 Assistant United States Attorney
8 Attorneys for Defendants

9 Dated: February 7, 2025


10 /s/ Anna Demidchik
11 ANNA DEMIDCHIK
12 Attorney for Plaintiff
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27 ² In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: February 10, 2025


RITA F. LIN
United States District Judge